

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REBECCA CHAN,

Plaintiff,

vs.

SECURE FREIGHT SYSTEMS (U.S.A.),
INC., a corporation registered in the State of
Washington, and MAPLE FREIGHT
PARTNERSHIP, a corporation registered in
the province of British Columbia, and KIT
BONNIE CHU, a resident of British Columbia,

Defendant

No. 2:22-CV-01272-JHC

STIPULATION, DECLARATION
AND ORDER TO AUTHORIZE
ALTERNATIVE MEANS OF
SERVICE UNDER FRCP RULE 4

[CLERK'S ACTION REQUIRED]

NOTE ON MOTION CALENDAR

NOVEMBER 18, 2022

I. STIPULATION

COME NOW, the parties to this action with the unserved Defendants, Kit Bonnie Chu and Maple Freight Partnership, all of whom hereby stipulate to the entry of the attached [Proposed] Order to Authorize Alternative Means of Service under FRCP Rule 4, allowing service of process in this matter by registered mail upon unserved Defendant Kit Bonnie Chu, a Canadian resident, and unserved Defendant Maple Freight Partnership, a Canadian partnership, pursuant to FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents ("Hague Convention").


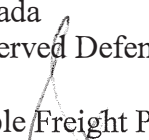
DATED this 18th Day of November 2022.

1 /s/ Alex Buerger

2 Alex Buerger, WSBA #25014
3 318 6th Ave. S #126
4 Seattle, WA 98104
5 Ph. 206-405-4520
6 Email: aberg@nwlinc.com
7 Attorney for Plaintiff Rebecca Chan

8 /s/ Karen P. Kruse

9 Karen P. Kruse, WSBA #19857
10 Karen Kruse Law, PLLC
11 P.O. Box 99556
12 Seattle, WA 98139-0556
13 Email: K2@KarenKruseLaw.com
14 Attorney for Defendant Secure Freight Systems (U.S.A.), Inc.

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16 _____
17 Kit Bonnie Chu, Individually
18 13700 Mayfield Place #1130
19 Richmond BC V6V 2E4
20 Canada
21 Unserved Defendant Kit Bonnie Chu
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23 Maple Freight Partnership
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27 Kit Bonnie Chu, President A2338 Enterprises, Inc.
28 13700 Mayfield Place #1130
Richmond BC V6V 2E4
Canada
Unserved Defendant, Maple Freight Partnership

II. DECLARATION OF KIT BONNIE CHU

I, Kit Bonnie Chu, being first duly sworn declare under penalty of perjury under the laws of the United States of America, Canada and the province of British Columbia that the foregoing is true and correct:

1. I am over eighteen years of age and I have been named as an individual defendant in the above captioned lawsuit.
2. On my own behalf, I hereby agree to accept service of process in this matter by registered mail at my residence, 1196 55th Avenue West, Vancouver, BC V6P 7A1 Canada, pursuant to Article 10(a) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents ("Hague Convention").
3. In regard to Maple Freight Partnership, I hereby affirm that A2338 Enterprises, Inc., is a general partner of Maple Freight Partnership; that I am the President of A2338 Enterprises, Inc.; and that I have been duly authorized by Maple Freight Partnership and its two (2) general partners (A2338 Enterprises, Inc. and Aero BC Enterprises, Inc.) to accept service of process by registered mail pursuant to Article 10(a) of the Hague Convention.
4. On behalf of Maple Freight Partnership, I hereby agree to accept service of process in this matter by registered mail at 13700 Mayfield Place #1130, Richmond, BC V6 V2EF, Canada, pursuant to Article 10(a) of the Hague Convention.
5. On behalf of A2338 Enterprises, Inc., I hereby agree to accept service of process in this matter by registered mail at Suite 500 North Tower, 5811 Cooney Rd., Richmond, BC V6X 3M1, which is the Registered Agent for A2338 Enterprises, Inc., pursuant to Article 10(a) of the Hague Convention.

1 6. In the event that any of the parcels identified in above Paragraph 2, 4 and 5 are returned
2 unclaimed or without signature, I agree to accept service of process by UPS delivery at
3 the addresses identified in above Paragraph 2, 4 and 5 on behalf of myself, Maple Freight
4 Partnership and A2338 Enterprises, Inc., pursuant to Article 10(a) of the Hague
5 Convention.
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7 7. On behalf of myself, Maple Freight Partnership and A2338 Enterprises, we hereby affirm
8 and warrant that we will not challenge the sufficiency of service of process as outlined in
9 the Court's Order proposed below.
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11 I declare under penalty of perjury of the laws of the United States of America, Canada
12 and the province of British Columbia that the foregoing is true and correct.

13 Signed and Dated this 18 day of November, 2022 at Richmond, BC.

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16 Kit Bonnie Chu
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III. ORDER

This Matter, having come before the Court on the parties' Stipulation and the Declaration of Kit Bonnie Chu,

IT IS HEREBY ORDERED that Plaintiff is hereby authorized to effect alternative means of service of process upon Defendant Kit Bonnie Chu and Maple Freight Partnership under FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents ("Hague Convention") by Registered Mail as follows:

1. Kit Bonnie Chu, 1196 55th Avenue West, Vancouver, BC, V6P 7A1, Canada.
2. Maple Freight Partnership, c/o Kit Bonnie Chu, 13700 Mayfield Place #1130, Richmond, BC V6 V2EF, Canada.
3. Maple Freight Partnership, c/o A2338 Enterprises, Inc., Suite 500 North Tower, 5811 Cooney Rd., Richmond, BC V6X 3M1, Canada.

IT IS FURTHER ORDERED that in the event any of the registered parcels are returned unclaimed or without signature, the Plaintiff is hereby authorized to effect service of process by UPS delivery at the addresses listed in Paragraph 1-3 above, pursuant to FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention.

IT IS FURTHER ORDERED that this Order shall not prohibit Plaintiff from also effecting service upon the Defendants by any other means authorized by the FRCP or the Hague Convention.

IT IS FURTHER ORDERED that this Order supersedes the Court's November 15, 2022 Order (Docket #16), which shall have no further force and effect after entry of this Order. The Clerk of the Court is directed to enter a Minute Order to that effect.

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1 ENTERED this 22nd day of November 2022.

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5 The Honorable John H. Chun
6 United States District Judge

7 Presented By:

8
9 /s/ Alex Buerger


10 Alex Buerger, WSBA #25014
11 Attorney for Plaintiff Rebecca Chan

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13 Copy Received; Notice
14 Of Presentation Waived:

15
16 /s/ Karen P. Kruse

17 Karen P. Kruse, WSBA #19857
18 Attorney for Defendant Secure Freight Systems (U.S.A.), Inc.

19 
20 Kit Bonnie Chu, Individually
21 Unserved Defendant

22 
23 Kit Bonnie Chu, President A2338 Enterprises, Inc.
24 Maple Freight Partnership
25 Unserved Defendant
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